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9 UNITED STATES DISTRICT COURT
10 NORTHERN DISTRICT OF CALIFORNIA
11 SAN FRANCISCO DIVISION

12 RICHARD KADREY, *et al.*,
13 Individual and Representative Plaintiffs,
14 v.
15 META PLATFORMS, INC., a Delaware
16 corporation;
17 Defendant.

Case No. 3:23-cv-03417-VC-TSH

**DECLARATION OF NIKKI VO IN SUPPORT
OF ADMINISTRATIVE MOTION TO FILE
UNDER SEAL EXHIBIT TO JOINT
DISCOVERY LETTER BRIEF**

1 I, Nikki Vo, hereby declare:

2 1. I am Director and Associate General Counsel for Defendant, Meta Platforms, Inc. I
3 have personal knowledge of the facts set forth in this declaration and, if called to testify as a witness,
4 could and would testify competently thereto.

5 2. I make this declaration in support of Meta's administrative motion to file under seal
6 portions of Exhibit A to the Parties' Joint Discovery Letter regarding Meta's Responses to
7 Plaintiffs' First and Second Sets of Requests for Admission ("Joint Letter Brief"). The motion
8 seeks to have the following partially sealed:

Document	Sealing Request
Exhibit A to Joint Letter Brief	<ul style="list-style-type: none"> Redacted portions

11 3. The redacted portions of Exhibit A to the Joint Letter Brief are responses to
12 Plaintiffs' Requests for Admission that Meta had designated "CONFIDENTIAL" under the
13 Protective Order in this case. The redacted responses refer to highly sensitive, non-public
14 information concerning Meta's business practices surrounding its Llama models and the datasets
15 used to train the Llama models.

16 4. Public disclosure of the information contained in the above-referenced materials
17 exposes Meta to the risk of financial and competitive harm by revealing Meta's non-public business
18 strategies, technical information, and trade secret information pertaining to its generative AI
19 offerings. Meta takes steps to carefully protect the confidentiality of information of this sort.

20 I declare under penalty of perjury under the laws of the United States of America that the
21 foregoing is true and correct

22 Executed in Palo Alto, California on this 26th day of November, 2024.

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25 Nikki Vo
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